

EXHIBIT A

STATE OF WISCONSIN
DEPARTMENT OF WORKFORCE DEVELOPMENT
EQUAL RIGHTS DIVISION

SANDRA GRAY-ROHAN,

Complainant,

ERD Case Nos.: CR2017010864 & CR201604893

EEOC Case Nos.: 26G201700874C & 443201601665C

v.

GATEWAY TECHNICAL COLLEGE,

Respondent.

**COMPLAINANT'S FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION
TO RESPONDENT DEAN HEALTH SYSTEMS**

TO: Gateway Technical College
c/o Attorney Michael Aldana
Attorney Lindsey Davis
411 East Wisconsin Avenue, Suite 2350
Milwaukee, WI 53202

The Complainant, Sandra Gray-Rohan, by her attorneys, Gingras, Cates & Wachs, by Paul A Kinne, pursuant to Wisconsin Statutes, Sections 804.08 and 804.09, hereby request that you answer the following interrogatories and respond to the following requests to produce documents in writing and under oath within thirty (30) days after service is made upon you.

INSTRUCTIONS

1. Answer each interrogatory separately and fully in writing under oath, unless it is objected to, in which event the reasons for the objection must be stated in lieu of the answer.

2. An evasive or incomplete answer is deemed to be a failure to answer under Rule 804.12, Wisconsin Rules of Civil Procedure.

3. You are under a continuing duty to supplement your response with respect to any questions directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert witness at trial and the subject matter in which he/she is expected to testify. Furthermore, you are under a similar duty to correct any incorrect response when you later learn that it is incorrect.

4. "You" or "your". "You" or "your" means the answering defendant/respondent, his/her/its agents, any entities which he/she/it owns or did own (in part or in full) and/or with which you have been associated, and all persons acting or purporting to act on his/her/its behalf.

5. "In your possession, custody or control." In your possession, custody or control means all documents which are in the possession, custody or control of the defendant/respondent, any entities which he/she/it owns or did own (in whole or in part) and/or with which you have been associated, their or his/her employee(s), agent(s), independent contractor(s) and all other person(s) acting on their and/or his/her behalf including, but not limited to accountants, attorneys, investigators, employees, business entities owned in whole or part by them or him/her, or agent(s).

6. "Document". "Document" shall mean any printed, written, recorded, typed, drawn, taped electronic, electromagnetic, graphic, photographic, or any other tangible matter or documentary material from whatever source, however produced or reproduced, whether sent or received or neither, whether original, copies, drafts, translations or otherwise, including the original and any nonidentical copy (whether different from the original because of notes made on or attached to such copy or the presence of signatures indicating execution or otherwise),

including but not limited to any and all writings, correspondence, letters, telegrams, telex communications, cables, advices, orders, opinions, notes notations, papers, memoranda, interoffice communications, intra-office communications, tapes, disks, brokerage account monthly statements, minutes of meetings, recordings or other memorials of any type of personal or telephone conversations, powers of attorney, meetings or conferences, reports, studies, analyses, evaluations, estimates, projections, forecasts, ledgers, books of account, computer printouts, hard copy printouts, programs, manuals, diaries, calendars, desk pads, appointment books, transcripts, checks, canceled checks, check stubs, checkbooks and financial statements.

7. "Identify" or "identity". "Identify" or "identity" when used in reference to a person means state the person's full name, telephone number, current residential and business address, together with your relationship with them, if any, and if not presently related, a description of any previous relationship with them.

8. "Identify" or "identity" when used in reference to a document means to state the date and author, type of document, (e.g., letter, memorandum, telegram, chart, etc.), addressee or other intended recipient or audience, a summary of its contents and its present location and custodian. In the event there are documents fitting the description set forth of which you are aware, which are no longer in your possession, custody or control, state the disposition and location of such documents and identify the person(s) who have or had possession, custody or control of such documents.

9. "Identify" or "identity" when used in referenced to a conversation, conference, meeting or other oral communication means to identify all persons participating or attending and to identify all documents recording, summarizing or otherwise arising from the conversation, conference, meetings or other oral communication in accordance with the definitions above. In

addition, a request to identify a conversation, conference, meeting or other oral communication means to state its purpose, the subject discussed, the method of communication used (e.g., telephone, in person, or other means) and if by telephone, specify the caller and the person called, the action taken at and following it, and the date, place and purpose of such action, and to identify the person(s) taking such action.

10. "Identify" or "identity" when used in reference to a contact means to identify any conversation, conference, meeting, oral communication, and/or written communication including the identity of all persons participating in and/or attending said conversation, conference, meeting, oral communication, and/or written communication and to identify all documents, recording, summarizing or otherwise arising from the conversation, conference, meeting, oral communication and/or written communication in accordance with the definitions set forth above. In addition, a contact means to state its purpose, the subject discussed, the method of communication used (e.g., telephone, in person, or other means) and if by telephone, specify the caller and the person called, the action taken at and following it, and the date, place and purpose of such action, and to identify the person(s) taking such action.

INTERROGATORIES

INTERROGATORY NO. 1: Identify all persons participating in answering these interrogatories by name and title.

INTERROGATORY NO. 2: Identify by name and title each person who participated in the decision to terminate Gray-Rohan. For each person you identify, describe his or her role in the termination.

INTERROGATORY NO. 3: Identify all reasons for Gray-Rohan's termination.

INTERROGATORY NO. 4: Identify all sources of information upon which the decision-makers relied in deciding to terminate Gray-Rohan.

INTERROGATORY NO. 5: Identify all persons by name and title who investigated any claim of discrimination Gray-Rohan brought to your attention.

INTERROGATORY NO. 6: Identify Gray-Rohan's earnings at the time of her termination.

INTERROGATORY NO. 7: Identify all benefits to which Gray-Rohan was entitled at the time of her termination. For each benefit you identify, state its annual cost to you.

INTERROGATORY NO. 8: Have any African Americans been terminated from Gateway Technical College from January 1, 2014, to the present? If the answer is "yes," identify this employee's title at the time of termination and the date of termination.

INTERROGATORY NO. 9: Has Gateway Technical College terminated an employee after that employee filed a charge of discrimination with the Equal Rights Division or the Equal Employment Opportunity Commission since January 1, 2014? If the answer is "yes," identify this employee's title at the time of termination and the date of termination.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce a copy of Gray-Rohan's personnel file.

REQUEST FOR PRODUCTION NO. 2: Produce a copy of any employee handbooks or manual's setting forth your policy on race discrimination and / or retaliation.

REQUEST FOR PRODUCTION NO. 3: Produce copies of any documents you provided to the EEOC or the ERD in response to any charges of discrimination or retaliation brought by Gray-Rohan.

REQUEST FOR PRODUCTION NO. 4: Produce copies any and all emails or text messages either to or from the decision-makers dealing in any way with the decision to terminate Gray-Rohan.

REQUEST FOR PRODUCTION NO. 5: Produce copies of any notes or reports written during or as a result of meetings or conversations dealing in any way with Gray-Rohan's termination.

REQUEST FOR PRODUCTION NO. 6: Produce copies of any documents or things that support the reasons for termination you described in response to Interrogatory No. 3.

REQUEST FOR PRODUCTION NO. 7: Produce any recordings you have of Gray-Rohan that in any way bear on her termination.


REQUEST FOR PRODUCTION NO. 8: Produce copies of any and all documents upon which you relied in answering the Interrogatories.

REQUEST FOR PRODUCTION NO. 9: Produce copies of any and all documents you identified in answering the Interrogatories.

Dated this 16th day of January, 2018.

GINGRAS, CATES & WACHS,
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(608) 833-2632

BY:



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Attorneys for Complaint